



City of  
**FRESNO**  
Mariposa Mall  
P.O. Box 1271  
Fresno, California 93715-1271

Police Department

Jerry Dyer  
Chief of Police

February 19, 2005

Dear Mr. Deepak Joshi,

As spokesman for my Department and our flight operation, I must respond to the NTSB Notice of Proposed Rulemaking (NPRM 427) posted in the Federal Regulation pages 77150 to 77152 on December 27, 2004. This proposes to eliminate ground rotor blade strike exemption from the "Substantial Damage" definition of 47 CFR 830.2 .

The definition is fine as it now stands. Any rotor strike that is considered a ground strike naturally occurs close to the ground, much like the propeller on an airplane. In any case, the results are the same as with an airplane propeller strike. The aircraft in all of these incidents are landed without substantial damage or injury to persons or property. Otherwise, they must already be reported as an accident. It is ludicrous to change the definition, as it does no good, only harm.

An information sheet was published by Mr. Roy Fox of Bell Helicopter Textron, dated 1 February, 2005. I have read this information and totally agree with Mr. Fox on everything he mentioned regarding NPRM 427. I am sure you are in possession of this seven page document, so have not attached it to this letter.

I am looking forward to your public response to this and the other comments you receive.

Sincerely,

A handwritten signature in black ink that reads "Michael J. White". The signature is written in a cursive, flowing style.

Michael J. White  
Chief Police Pilot  
Fresno Police Dept.,  
2323 Mariposa  
Fresno, CA 93702